

May 25, 2018

Judge Valerie Caproni
United States District Court Judge
Southern District of New York
United States Courthouse
40 Foley Square
New York, NY 10007

Re: U.S. v. Kaloveros, et al.
Case No. 1:16-cr-00776

Dear Judge Caproni:

We are writing in response to the Government's request for an adjournment of the trial of this matter. (ECF Doc. 675) The Government noted we object to this request but we wish to expand on our reasons.

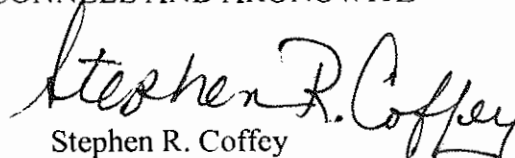
I am scheduled to begin a complicated medical malpractice trial this summer, which will require extensive preparation. A delay of this trial will impact this. Obviously, no one can predict the amount of time that this trial will take. For example, it was anticipated that our last trial would conclude in six weeks and, in fact, it lasted close to ten weeks. In the context of this case, we do not believe that reviewing 1,500 documents warrants a delay of this trial. We believe the Government should be able to accomplish its review of these documents in perhaps one day, given its vast resources.

If the Court, however, is inclined to grant the Government's request, we would ask that the trial be adjourned for one week only.

Respectfully yours,

O'CONNELL AND ARONOWITZ

By:


Stephen R. Coffey

SRC:dh

cc: all parties – via ECF

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1925-1939
SAMUELE E. ARONOWITZ
1925-1973
LEWIS A. ARONOWITZ
1951-1979

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